

**Before the  
Federal Communications Commission  
Washington, D.C.**

**In the matter of:**

Revitalization of the AM Radio Service    )  
  )     **MB Docket No. 13-249**  
  )

**REPLY COMMENTS OF CARL T. JONES CORPORATION**

Carl T. Jones Corporation, an engineering consulting firm, hereby replies to certain comments submitted in response to the Commission’s October 31, 2013 Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding. In the NPRM, the Commission requested comments on specific proposals and invited the submission of additional proposals.

We are very pleased and encouraged by the enormous response to this Rulemaking Proceeding which we believe demonstrates the widespread interest in revitalizing the AM Radio Service. In addition to the specific proposals advanced by the Commission in the NPRM, we believe that many additional proposals submitted in response to the NPRM are well thought out and have the potential to significantly improve the AM Radio Service. Our reply comments focus on a select few of the many proposals currently before the Commission intended to revitalize the AM service. However, given the intense interest in this proceeding and the multitude of proposals currently under evaluation, we urge the Commission to consider adopting the necessary rule and policy changes in multiple stages, possibly through further NPRM’s and

multiple Orders, in order to fully analyze and fully realize every proposal which would further the Commission's goal of revitalizing the AM radio service. Such an approach would keep the momentum generated by the instant proceeding moving forward and would allow for expeditious implementation of the necessary rule and policy changes for which there is universal support and clear purpose.

### **FM Translator Window Exclusively for AM Licensees and Permittees**

The comments were overwhelmingly in favor of opening an FM translator application filing window exclusively for AM Licensees and Permittees. The current Rules require that the 60 dBu contour of an FM translator used to rebroadcast an AM station be wholly within the AM station's 2 mV/m daytime contour or within a 25 mile radius of the AM station's transmitter site whichever is the lesser. We agree with several commenters that suggested that this limitation is too restrictive and we therefore support modification of this Rule.

In many cases an AM station's 2 mV/m daytime service contour extends well beyond 25 miles. This can be true even at moderate power levels where high soil conductivity exists or where the station's frequency is in the lower portion of the AM Band. In these cases, many communities that an AM station serves during daytime hours are located outside the 25 mile radius from the station but are within the 2 mV/m daytime contour. Under the current Rules, this area would not be eligible for translator service. During nighttime hours however these same communities may lose service from the AM station due to skywave interference or differences in the daytime and nighttime radiation patterns or powers or both. Restricting the FM translator's

60 dBu contour to 25 miles from the AM station's transmitter site, in these cases, deprives these communities from receiving nighttime service by means of an FM translator.

In other cases, as pointed out in the comments of Hatfield and Dawson Consulting Engineers, LLC ("H&D Comments"), severe radiation restrictions in certain daytime directional patterns can severely limit the distance to the 2 mV/m contour which in turn limits FM translator siting opportunities under the current Rules and again may deprive communities from receiving nighttime service due, in these cases, to the 2 mV/m limitation.

To remedy both of the situations described above, we support a modification to the Rule to allow the translator's 60 dBu contour to be wholly within the AM station's 2 mV/m daytime contour or within a specified radius of the AM station's transmitter site whichever is the greater. If the specified radius is too great, the 60 dBu contour of the FM translator may extend well beyond the 2 mV/m daytime contour of the AM station. With this in mind, we believe that the 25 kilometer (15.5 mile) radius suggested in the H&D Comments strikes a reasonable compromise.

### **AM Expanded Band**

We agree with several of the Commenters who support opening the AM Expanded Band frequencies for the filing of major and minor change applications. Specifically, we believe that the AM Expanded Band should be made an integral part of the original AM band and that the Rules governing the processing of applications, that specify a frequency between 1610 kHz to

1700 kHz, should be the same as those for the original AM Band. If the FCC would, in addition, modify the definition of a minor change application to include allowing a station to change its frequency to any available frequency, as suggested in the Comments of Communications Technologies Inc., then it would be possible for existing licensees to migrate to the expanded band by application without the need for a Filing Window. Further, this would allow relief to stations with a co-channel and adjacent channel relationship to the vacated frequency.

### **Foreign Station Consideration in Domestic Allocation Matters**

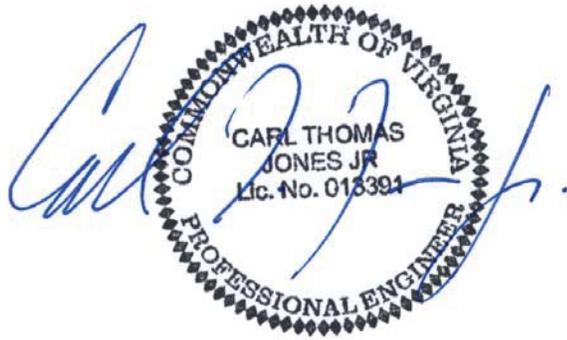
We agree with those Commenters who urged the FCC to revise its policy with regard to domestic and foreign contour overlap within US borders. Currently the FCC will not grant an application that proposes overlap of the daytime protected contour of a domestic station with the daytime interfering contour of a foreign station where the overlap is wholly within the United States. We agree with the Commenters that this policy should be eliminated in order to allow AM licensees whose stations are in the border regions of the United States more flexibility to relocate or modify their facilities to better serve their communities.

### **Summary**

In our reply comments we have only commented on a few of the new proposals submitted by the Commenters in this Proceeding, however we believe that many more of the proposals, when fully studied and developed, have the potential to offer enormous benefit to the AM Radio Service. We therefore urge the FCC to maintain the current momentum of the instant

proceeding by adopting the necessary rule and policy changes as quickly as possible while keeping the Docket open in order to fully evaluate and possibly invite further comments with respect to all of the potentially impactful suggestions advanced by both the Commission and the commenters.

Respectfully Submitted, March 20, 2014



Carl T. Jones, Jr., P.E.  
Carl T. Jones Corporation  
Consulting Engineers  
7901 Yarnwood Court  
Springfield, VA 22153  
(703) 569-7704